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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

A.M., an individual,

Plaintiff,

vs.

OMEGLE.COM LLC,

Defendant.

Case No. 3:21-CV-01674-MO

LEIF K-BROOKS' DECLARATION IN
SUPPORT OF DEFENDANT
OMEGLE.COM LLC'S MOTION FOR
SUMMARY JUDGMENT

I, Leif K-Brooks, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters stated herein.

If called upon to do so, I would testify truthfully as follows.

2. I am the sole member of defendant Omegle.com LLC ("Omegle"). In 2009, I designed Omegle.com as a teenager living in Vermont. I have been Omegle's sole employee since its inception.

3. Omegle was formed as an Oregon LLC in 2013. Prior to its formation, Omegle.com operated as a sole proprietorship. I lived in Oregon from 2010-2014. Omegle has no other Oregon-specific connection.

4. In January 2014, a user who went to Omegle.com had the option to click “text” or “video” to be randomly paired with another user. If a user selected text, her browser would submit a request to the Omegle server. The text request would be processed by another Omegle server to find someone who was available to be connected to the user. The random pairing of users occurs via Omegle’s servers. At the time Plaintiff alleges she was paired with Mr. Fordyce in January 2014, Omegle’s servers were located in New York and/or New Jersey. Omegle.com’s servers have never been located in Oregon. Aside from the addition of the common interests feature and a feature pairing users who speak the same language, the basic functionality of the text chat feature did not change between 2009 and early 2014.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on the 19th day of July, 2023 at winter Park, Florida.

DocuSigned by:

Leif K Brooks

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Leif K Brooks